

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

NORTHERN ILLINOIS ELECTRICAL JOINT	)	
APPRENTICESHIP & TRAINING TRUST FUND,	)	
<i>et al.</i> ,	)	
	)	CIVIL ACTION
Plaintiffs,	)	
	)	NO. 16 C 5670
vs.	)	
	)	JUDGE REBECCA R. PALLMEYER
LEE COUNTY ELECTRIC, INC., an Illinois	)	
corporation,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, LEE COUNTY ELECTRIC, INC., an Illinois corporation, in the total amount of \$21,261.26, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$2,862.00.

On June 15, 2016, the Summons and Complaint was served on the Registered Agent/President (by tendering a copy of said documents to Lisa Fitzimmons) at his place of business/residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on July 6, 2016. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan \_\_\_\_\_

**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 1st day of September 2016:

Mr. Thomas J. Fitzsimmons, Registered Agent  
Lee County Electric, Inc.  
1405 Ann Avenue  
Dixon, IL 61021

/s/ Patrick N. Ryan \_\_\_\_\_

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